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8 **UNITED STATES DISTRICT COURT**
9 **WESTERN DISTRICT OF WASHINGTON**
10 **TACOMA DIVISION**

11 WILL CO. LTD. a limited liability company
12 organized under the laws of Japan,

13 Plaintiff,

14 vs.

15 KA YEUNG LEE, an individual; YOUHAHA
16 MARKETING AND PROMOTION LIMITED,
17 a foreign company; and DOES 1-20, d/b/a
THISAV.COM,

18 Defendants.

Case No.: 3:20-cv-05802-BHS

**DECLARATION OF JASON TUCKER
IN SUPPORT OF PLAINTIFF WILL
CO. LTD'S *EX PARTE* MOTION FOR
LEAVE FOR ALTERNATIVE
SERVICE**

19 I, Jason Tucker, declare:

20 1. I am a United States Citizen, over the age of 18 years old, make this declaration
21 based upon personal knowledge and, if called to testify could and would testify competently to
22 the facts set forth herein.

23 2. I am the President of Battleship Stance Inc. ("Battleship"), a leading intellectual
24 property management and anti-piracy enforcement company. Our clients include award winning
25 adult entertainment studios including Plaintiff.

26 DECLARATION OF JASON TUCKER ISO
PLAINTIFF'S MOTION FOR ALTERNATIVE
SERVICE [NO. 3:20-cv-05802-BHS]

- 1

FREEMAN LAW FIRM, INC.

1107 ½ Tacoma Avenue South

Tacoma, WA 98042

(253) 383-4500 - (253) 383-4501 (fax)

1 3. Battleship is retained by some of the world's largest intellectual property rights
2 owners to provide intellectual property management, anti-piracy, and support services.

3 4. I have been in the business of legal adult entertainment production (both on and
4 off the Internet), marketing, and management at technical and executive level for over ten (15)
5 years, serving for over six (6) years as President of a company that owned and licensed one of the
6 world's largest libraries of erotic images.

7 5. I am a graduate of the FBI and DEA Citizens Academy and a member of
8 InfraGard. I have received advanced training by both agencies that in turn have furthered my
9 ability to assist seeking out and defining operations and pirate enterprises. My efforts have been
10 acknowledged with awards from State of California Senate, the FBI, DEA, and Los Angeles
11 Sheriff's Department as a few examples.

12 6. I have served as a consultant to Fortune 100 companies including Microsoft
13 Corporation for the rollout of several versions of Windows Media and in the development and
14 roll out of their Digital Rights Management technology and Akamai Technologies among others.

15 7. As an experienced executive within the adult entertainment industry, I have been
16 featured and quoted in publications including Newsweek, BusinessWeek, USA Today, Wired,
17 and the Washington Post and frequently am requested to speak on panels and at seminars at
18 industry events on various industry related topics and trends including anti-piracy.

19 8. Battleship Stance Inc. was retained by Will Co. Ltd. to investigate copyright and
20 trademark violations and assist in enforcing their intellectual property rights.

21 9. As a part of my duties to Will Co. Ltd., I have investigated the web site
22 ThisAV.com. In doing so, I have located copyrighted works owned by Will Co. that are displayed
23 on ThisAV.com without license or authority.

24 10. The web pages of ThisAV.com fail to state any owner or operator of the site.
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26 DECLARATION OF JASON TUCKER ISO
 PLAINTIFF'S MOTION FOR ALTERNATIVE
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- 2 -

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11. I have researched ThisAV.com with the United States Copyright Office DMCA Registration listings. The owners and operators of ThisAV.com have not registered the web site as an Internet Service Provider. There are no records of ThisAV.com with the Copyright Office, and thus no ownership or operator information.

12. In early November 2020, I was provided with information provided by Tiger Media. regarding ThisAV.com. Tiger Media's records indicate that the account holder for services to ThisAV.com is Youhaha Marketing and Promotion Limited with an address of 7/F Kowloon Building, 555 Nathan Road, Hong Kong and an email address listed as youhahahk@gmail.com.

13. In early November 2020, I was provided with information provided by Gorilla Services, Inc regarding ThisAV.com. Gorilla Servers's records show Ka Yeung Lee and the company Youhaha Marketing and Promotion Limited as the account holders for the account specific to ThisAV.com, with an address of Flat 701, Kowloon Building, 555 Nathan Road, Kowloon, Hong Kong, and email addresses of panda4uhk@gmail.com and tech@zenex5ive.com.

14. Utilizing industry standard Internet research tools, I investigated the addresses listed in the Tiger Media and Gorilla Service records. I determined that the addresses were the same location and building.


15. I also determined that the building is set up for virtual offices, where renters can purchase different packages which provide services including mail handling, business registry address, telephone services with email notification, and call transfer services. There is no presence of actual businesses or business employees.

16. I also utilized the email addresses listed in the Tiger Media and Gorilla Service records, youhahahk@gmail.com (Tiger Media for Youhaha), panda4uhk@gmail.com and tech@zenex5ive.com (Gorilla Servers for both Lee and Youhaha).

19. I utilized industry standard Internet research tools in an attempt to located physical address for both Lee and Youhaha. I was unable to find a physical locations for either.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Execute on the 11th day of December, 2020 at Scottsdale, Arizona.


Jason Tucker